

## Privacy and Data Protection Notice

Butterworth Spengler (CycleSure) Ltd act in the capacity of the data controller and will treat all your personal information as private and confidential, even when you are no longer a customer, in accordance with the Data Protection Act 1998 and any subsequent legislation.

### **Our Legal basis for processing data:**

Data Processing is necessary for the purposes of legitimate interest pursued by us except where such interests are overridden by the interests, rights or freedoms of the data subject (you).

### **What information we collect about you and the purpose of its use:**

When you contact us for the purposes of arranging and administering an insurance contract on your behalf, we collect the relevant information needed by an insurer for carrying out your request.

### **When we collect this information:**

We collect this information during our meetings and/or telephone conversations, e-mail, or via online submission forms. This can be at any stage before or during the lifetime of a policy held with us.

### **How we store your personal data:**

We hold your personal data electronically and in paper form. Our IT system is securely backed up to protect your data as best we can from cyber attack or hacking. Our paper records are securely stored at our premises or at specialist third party data storage facilities whose data security policies have been vetted by us.

### **How your information will be used and who we may share it with:**

We will use and disclose the information we have about you in the normal course of arranging and administering your insurances and arranging the performance of a contract of insurance in order to meet our contractual obligations to you, which may include: (i) where we are required to do so by law; (ii) by virtue of our regulatory requirements and (iii) passing information about you to credit reference agencies for the purposes of arranging payments by instalments and may also pass to them details of your payment record with us.

Insurers may also use the information you supply to obtain credit and other checks that they need to take from Credit Reference Agencies or similar sources which may show as an entry on your credit record. This may happen at quotation stage even if you do not proceed with a policy.

Should you not wish us to use or process your data in this way, we may not be able to arrange or administer your insurances or process data as necessary for the performance of a contract in order to meet our contractual obligations to you.

### **E-Mail security**

Email is not a completely secure means of transmission of data or documents, so by providing your email address to us you are giving your informed consent to us using this method to contact you and to send you your policy documents. If you would prefer us not to use this method of contact, please let us know.

### **Length of Data Retention**

We will retain your data for a minimum of 6 years after our professional relationship has terminated. However, as a professional adviser we have a duty to be able to demonstrate the existence of insurance covers many years after the cover may have expired and may choose not to delete data if we feel it is in your best interest.

### **Your rights**

**Right of Access** - You have a right, to obtain a copy of the personal information that we hold about you free of charge and within one month of the request. If you believe that any information held is incorrect or incomplete, you should contact us. This will be amended promptly.

**Right to correct your information:** If the information we hold for you is incomplete or incorrect, you have the right to request a correction.

**Right to object** - You have the right to object to us processing personal data based on grounds relating to your situation. If you object to us processing your personal data we will stop unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or, the processing is for the establishment, exercise or defence of a legal claim.

**Erasure rights:** You have the right to remove consent for us to hold and use your data and at this point we will ensure that your data is no longer used for the purposes for which you have provided it.

**Your Right to Complain:** You can complain to the Information Commissioners Office if you feel there is a problem with the way we have handled your data. Please contact <https://ico.org.uk/concerns/handling/>

#### **Transfer of Data outside the EEA**

We will not transfer any data that we hold about you outside of the European Economic Area (EEA), member countries which apply the same level of protection to data held there as in the United Kingdom. If personal data is transferred outside the EEA it will receive an adequate level of protection as required by the Data Protection Laws. Third parties will only process your personal information on our instructions and on agreement that the information is kept secure and confidential.

#### **Marketing**

We take your privacy seriously and will only use your data to administer your account and to provide the products and services you have requested from us. We will obtain confirmation from you that we may contact you about any other products and services that we feel may be suitable or appropriate.

We will not use your information or share your information with any other company for marketing purposes without your prior consent.

You may exercise your right to give notice to stop data being processed for marketing purposes by contacting us at any time.

Except as set out in this document, we will not otherwise disclose any information to any other parties without your written consent, unless we are legally obliged to do so.

Our contact details for data protection purposes are:

P Coffey, Butterworth Spengler (CycleSure) Ltd, 20-24 Faraday Road, Wavertree Technology Park, Liverpool, L13 1EH.

Tel: 0151 494 4400

E-mail: [pcoffey@butterworthspengler.co.uk](mailto:pcoffey@butterworthspengler.co.uk)

#### **Revisions to our Privacy Notice**

We reserve the right to revise this Notice or any part of it from time to time and will provide you with a new Privacy Notice where any substantial updates are made. We may also notify you through other means, about the processing of your information.

In the interests of security and to improve our service, telephone calls are recorded.